

Exhibit 182

Redacted Public Version

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Page 1

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK
3

4 NIKE, INC.,

5 Plaintiff,

6 v.

No. 1:22-CV-00983-VEC

7 STOCKX LLC,

8 Defendant.
9

10 VIDEOTAPED DEPOSITION OF LAURA RIZZA

11 Taken in behalf of the Defendant

12 February 1, 2023
13

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<p style="text-align: right;">Page 2</p> <p>1 BE IT REMEMBERED THAT pursuant to Federal</p> <p>2 Rules of Civil Procedure, the deposition of LAURA</p> <p>3 RIZZA was taken before Julie A. Walter, CSR No.</p> <p>4 90-0173 on February 1, 2023, commencing at the hour</p> <p>5 of 9:42 a.m., the proceedings being reported in the</p> <p>6 law offices of Stoel Rives, 760 SW Ninth Avenue,</p> <p>7 Suite 3000, Portland, Oregon.</p> <p>8 * * *</p> <p>9 APPEARANCES</p> <p>10 DLA PIPER</p> <p>11 Mr. Marc Miller</p> <p>12 1251 Avenue of the Americas</p> <p>13 New York, New York 10020</p> <p>14 Counsel for the Plaintiff</p> <p>15</p> <p>16 DEBEVOISE & PLIMPTON LLP</p> <p>17 Mr. Christopher Ford</p> <p>18 650 California Street</p> <p>19 San Francisco, California 94108</p> <p>20 Ms. Mai-Lee Picard</p> <p>21 919 Third Avenue</p> <p>22 New York, New York 10022</p> <p>23 Counsel for the Defendant</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 EXHIBIT INDEX</p> <p>2 Number Item Page</p> <p>3 Exhibit 1 [REDACTED] Presentation 28</p> <p>4 NIKE 0040131 through 40160</p> <p>5 Exhibit 2 Plaintiff Nike Inc. 66</p> <p>6 Supplemental Responses and</p> <p>7 Objections to Defendant</p> <p>8 StockX LLC's Second Set of</p> <p>9 Interrogatories</p> <p>10 Exhibit 3 11/11/21 Email With 79</p> <p>11 Attachments</p> <p>12 NIKE 0029176 to 0029186</p> <p>13 Exhibit 4 11/11/21 email with 85</p> <p>14 Attachments</p> <p>15 NIKE 0029156 to 0029175</p> <p>16 Exhibit 5 11/15/21 Email Thread 90</p> <p>17 NIKE 0029187 to 29191</p> <p>18 Exhibit 6 List [REDACTED] 99</p> <p>19 NIKE 0039044</p> <p>20 Exhibit 7 3/7/22 Email Thread 107</p> <p>21 NIKE 0040472 to 0040478</p> <p>22 Exhibit 8 4/20/22 Email Thread 115</p> <p>23 NIKE 0025918 to 0025922</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES CONTINUED:</p> <p>2</p> <p>3 Also Present:</p> <p>4 Kimberly Van Voorhis</p> <p>5 Assistant General Counsel Nike</p> <p>6</p> <p>7 Mick Irwin</p> <p>8 Videographer</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 Exhibit 9 10/25/21 Email with 132</p> <p>2 attachment</p> <p>3 NIKE 0060175 to 0060224</p> <p>4 Exhibit 10 FY20 Q2 North American 137</p> <p>5 Impact Report</p> <p>6 NIKE 0039827 to 39832</p> <p>7 Exhibit 11 9/25/20 Email with 140</p> <p>8 Attachment</p> <p>9 NIKE 0039841 to 0039846</p> <p>10 Exhibit 12 12/11/20 Email with 146</p> <p>11 Attachment</p> <p>12 NIKE 0039847 to 0039853</p> <p>13 Exhibit 13 3/29/21 Email with 152</p> <p>14 Attachment</p> <p>15 NIKE 0039833-0039840</p> <p>16 Exhibit 14 8/11/11 Email with 159</p> <p>17 Attachment</p> <p>18 NIKE 0042530</p> <p>19 Exhibit 15 5/27/20 Email Thread 170</p> <p>20 NIKE 0040486</p> <p>21 Exhibit 16 Excel Spreadsheet 179</p> <p>22 NIKE 0039436</p> <p>23</p> <p>24</p> <p>25</p>

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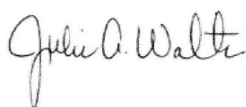
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<p style="text-align: right;">Page 182</p> <p>1 spreadsheet originate?</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 Q. I see. Who took these photographs?</p> <p>6 A. I did. I took these photographs, I think.</p> <p>7 [REDACTED]</p> <p>8 photograph these products?</p> <p>9 A. I did.</p> <p>10 Q. And when did that happen?</p> <p>11 A. I don't remember the exact date.</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 A. To make sure they were well documented and we had a</p> <p>18 thorough understanding of the findings.</p> <p>19 Q. And does this -- these two pages with Pair 1</p> <p>20 through 15 set out all of the counterfeit or</p> <p>21 allegedly counterfeit NIKE product that you</p> <p>22 identified during your May 27, 2022, visit to the</p> <p>23 warehouse?</p> <p>24 MR. MILLER: Objection.</p> <p>25 THE WITNESS: Sorry, can you repeat that.</p>	<p style="text-align: right;">Page 184</p> <p>1 these product boxes?</p> <p>2 A. I did my best to do a complete documentation of</p> <p>3 what I found in the boxes.</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>
<p style="text-align: right;">Page 183</p> <p>1 Q. BY MR. FORD: Sure. I know it was a long question.</p> <p>2 Do these two pages that are titled "Identified</p> <p>3 May 27th, 2022," pairs 1 through 15 set out all of</p> <p>4 the counterfeit or allegedly counterfeit product</p> <p>5 that you identified -- sorry, NIKE product that you</p> <p>6 identified during your May 27th, 2022, visit to the</p> <p>7 [REDACTED]</p> <p>8 MR. MILLER: Objection to form.</p> <p>9 THE WITNESS: Yes.</p> <p>10 Q. BY MR. FORD: If you look at this [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 Why were there columns specifically for "StockX</p> <p>16 Tag" and "StockX Receipt" in this spreadsheet?</p> <p>17 A. I was trying to document what was in the boxes.</p> <p>18 Q. For the items where there is a no under StockX</p> <p>19 receipt, does that mean there was no receipt of any</p> <p>20 kind in the boxes or just that there was no StockX</p> <p>21 receipt in the boxes?</p> <p>22 A. There was no receipt of any kind.</p> <p>23 Q. Other than the items that are photographed here,</p> <p>24 was there anything in these boxes of any kind, or</p> <p>25 is this a complete documentation of what you saw in</p>	<p style="text-align: right;">Page 185</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

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<p style="text-align: right;">Page 202</p> <p>1 know anything about their authenticity. In my</p> <p>2 opinion, NIKE itself is the only -- or most</p> <p>3 equipped to authenticate product.</p> <p>4 MR. FORD: I see. Okay. All right. Why don't</p> <p>5 we take a break, and I will see if I have anything</p> <p>6 left.</p> <p>7 (RECESS 4:24 to 4:35)</p> <p>8 Q. BY MR. FORD: So, Ms. Rizza, before the break, we</p> <p>9 were talking about the shoes from the [REDACTED]</p> <p>10 [REDACTED] that were in Exhibit 16, the spreadsheet</p> <p>11 with all of the pictures.</p> <p>12 A. Yeah.</p> <p>13 Q. Do you have -- do you know whether the products</p> <p>14 that you evaluated at [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 MR. MILLER: Objection.</p> <p>19 THE WITNESS: Are you asking me if the products</p> <p>20 that I evaluated are the same products that came</p> <p>21 [REDACTED]</p> <p>22 Q. BY MR. FORD: Yes. I'm just asking if you</p> <p>23 personally know that [REDACTED]</p> <p>24 [REDACTED] in fact,</p> <p>25 the same products as were in the warehouse --</p>	<p style="text-align: right;">Page 204</p> <p>1 will consider the deposition closed.</p> <p>2 (DEPOSITION ADJOURNED at 4:36)</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 203</p> <p>1 MR. MILLER: Objection.</p> <p>2 Q. BY MR. FORD: -- that you looked at?</p> <p>3 A. I'm confident they are, yes.</p> <p>4 Q. What's that confidence based on?</p> <p>5 MR. MILLER: Objection.</p> <p>6 THE WITNESS: [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED] and in the conditions under which they were</p> <p>9 transported and stored.</p> <p>10 Q. BY MR. FORD: [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 A. No.</p> <p>14 Q. Do you know -- do you know someone named Roy Kim?</p> <p>15 A. No.</p> <p>16 Q. Does the Instagram handle "sneakerstrut" ring a</p> <p>17 bell? No?</p> <p>18 A. No.</p> <p>19 Q. Do you have any awareness of an investigation NIKE</p> <p>20 did into potential counterfeit products purchased</p> <p>21 by an individual named Roy Kim in July of 2022?</p> <p>22 A. That doesn't sound familiar to me.</p> <p>23 MR. FORD: Okay. Then I don't have anything</p> <p>24 further.</p> <p>25 MR. MILLER: I don't have any redirect, so we</p>	<p style="text-align: right;">Page 205</p> <p style="text-align: center;">C E R T I F I C A T E</p> <p>1</p> <p>2</p> <p>3 I, Julie A. Walter, CSR No. 90-0173, do hereby</p> <p>4 certify that LAURA RIZZA appeared before me at the</p> <p>5 time and place mentioned in the caption herein;</p> <p>6 that the witness was by me first duly sworn on oath</p> <p>7 and examined upon oral interrogatories propounded</p> <p>8 by counsel; that said examination together with the</p> <p>9 testimony of said witness was taken down by me in</p> <p>10 stenotype and thereafter reduced to typewriting;</p> <p>11 and that the foregoing transcript, Pages 1 to 204,</p> <p>12 both inclusive, constitutes a full, true and</p> <p>13 accurate record of said examination of and</p> <p>14 testimony given by said witness and of all other</p> <p>15 proceedings had during the taking of said</p> <p>16 deposition, and of the whole thereof, to the best</p> <p>17 of my ability.</p> <p>18 Witness my hand at Portland, Oregon, this 6th</p> <p>19 day of F</p> <p>20 </p> <p>21</p> <p>22 Julie A. Walter</p> <p>23 CSR No. 90-0173</p> <p>24</p> <p>25</p>

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